

MATTHEW J. KLUGER
ATTORNEY AT LAW

MEMO ENDORSED

888 GRAND CONCOURSE, SUITE 1H
BRONX, NEW YORK 10451
(718) 293-4900 • FAX (718) 618-0140
www.klugerlawfirm.com

January 10, 2025

Honorable Sidney H. Stein
Senior United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Christopher Machado
21 Cr. 249 (SHS)

Dear Judge Stein:

On November 14, 2022, Mr. Machado appeared before your Honor and was sentenced primarily to 36-months in custody followed by two years of supervised release following his guilty plea to conspiracy to commit firearms offenses. Mr. Machado was released from BOP custody on or about May 24, 2024. He now appears before your Honor after having been accused of violating his supervised release. (See Amended Violation Report prepared by USPO Robert Terry-Brooks dated January 3, 2025.) Mr. Machado was taken back into federal custody on or around December 5, 2024. The next VOSR hearing has been scheduled for February 27, 2025 at 9:30 a.m.

Pursuant to the status conference held earlier this week, the defense writes now with a proposed bail package for the Court's consideration. It appears that Mr. Machado's greatest obstacle to successful transition onto supervised release has been his inability to find and maintain stable housing. Thankfully, Mr. Machado's girlfriend, Giana Montalvo, who works as a waitress and has her own apartment in Brooklyn, has agreed to allow Mr. Machado to reside with her. Given this significant development, with the consent of both the Government as well as Probation, the defense proposes that Mr. Machado be released subject to the following conditions, which are in addition to those conditions already in place as part of Mr. Machado's term of supervised release:

1. A \$50,000 PRB to be signed by Ms. Montalvo (assuming that the government determines her to be a financially responsible person);

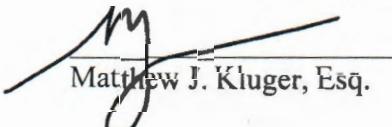
2. Home Detention enforced by location monitoring to be determined by Probation;
3. Travel restricted to the Southern and Eastern Districts of New York with any additional travel subject to the approval of his Probation Officer;
4. If the defendant has a passport, he will surrender it to Probation and make no new applications;
5. All standard conditions and any special conditions that the Court deems necessary and appropriate.

The mandatory conditions plus 1-12 *1-4 set forth in the judgment*
dated November 14, 2022

As noted above, both AUSA Ashley C. Nicolas and U.S. Probation Officer Robert Terry-Brooks consent to the above bail conditions.

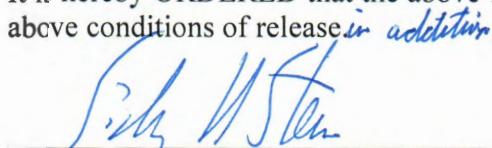
Thank you for the Court's consideration.

Respectfully Submitted,


Matthew J. Kluger, Esq.

cc: AUSA Ashley C. Nicolas
AUSA Matthew King
U.S. Probation Officer Robert Terry-Brooks

It is hereby ORDERED that the above-named defendant be released subject to satisfaction of the above conditions of release *in addition to those already in place.*


Hon. Sidney H. Stein, Senior USDJ

Dated: *January 10, 2025*